

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

WILLIAM HANSON, III,

Plaintiff,

v.

LOWE'S HOME CENTERS, INC., et al,

Defendants.

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C.A. No. 05-0046 (JJF)

TRIAL BY JURY DEMANDED

**PLAINTIFF'S INITIAL DISCLOSURES MADE PURSUANT TO  
FED. R. CIV. P. 26(a)(1)**

Plaintiff William Hanson, III, by and through his attorneys, Schmittinger and Rodriguez, P.A., hereby discloses the information required by Fed. R. Civ. P. 26(a)(1) to Defendant as follows:

A. The following individuals are likely to have discoverable information that Plaintiff may use to support his claims (but not solely for impeachment):

1. Plaintiff William Hanson, III;
2. Yvette Schriver, Store Manager, Lowe's #587;
3. Linda Myers, Assistant Store Manager, Lowe's #587;
4. Jeremy Leaman, Ideal Merchandising;
5. Keith Dominick, Assistant Store Manager, Lowe's #587;
6. Carlos Vazquez, Zone Manager, Lowe's;
7. Jeff Ramiez, Department Manager, Lowe's;
8. Steve Folder, Plumbing Specialist, Lowe's;
9. Corlene (last name unknown), Manager, Lowe's;
10. Buck (last name unknown), Electrical Specialist, Lowe's.

B. Copies of all documents, data compilations, and tangible things in the possession, custody, or control of Plaintiff that Plaintiff may use to support his claims (but not solely for impeachment), other than information related to Plaintiff's damages are attached to Plaintiff's Response to Defendant DDP Holdings' First Request for Production of Documents.

C. The categories of damages claimed by Plaintiff are as set forth in Plaintiff's Complaint. These damages are not subject to quantification at this point. Evidence regarding

damages will be provided in discovery as requested by Defendant.

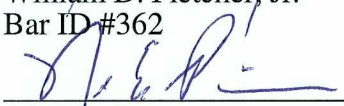
D. Plaintiff has no obligation for disclosure pursuant to Fed. R. Civ. P. 16(a)(1)(D).

SCHMITTINGER & RODRIGUEZ, P.A.

BY:

  
William D. Fletcher, Jr.  
Bar ID #362

BY:

  
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Dated: 5-2-05  
WDF:tcl